

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

ALISON O'DONNELL,

Plaintiff,

vs.

Case No. 1:16-cv-2450
Judge Donald E. Nugent

UNIVERSITY HOSPITALS
HEALTH SYSTEM, et al.,

Defendants.

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DEPOSITION OF FRANCOISE ADAN, M.D.
Thursday, October 26, 2017

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The deposition of FRANCOISE ADAN, M.D., a
witness, called for examination by the
Plaintiff under the Federal Rules of Civil
Procedure, taken before me, Diane M. Stevenson,
a Registered Diplomate Reporter, Certified
Realtime Reporter, and Notary Public in and for
the state of Ohio, pursuant to notice, at
Vorys, Sater, Seymour & Pease LLP, 200 Public
Square, Suite 1400, Cleveland, Ohio, commencing
at 3:00 p.m., the day and date above set forth.

Stevenson Reporting Service, Inc.
2197 Macon Court Westlake, Ohio 44145
440.892.8600 diane@nls.net

1 fellowship program and you are not saying that
2 they don't know how to train fellows at UH,
3 right?

4 A. Of course.

5 Q. You are not trying to redo the fellowship
6 program, you were giving some recommendations
7 for them to consider?

8 A. Correct.

9 Q. Okay. And I guess let me just ask you: Do you
05:19 10 know anything that happened after your letter?
11 I mean, did she -- it looks to me as if she
12 came on May 3, 2012, Exhibit 49, and then she
13 didn't come in again until 51, 2013.

14 Did I read those right?

15 A. Yes.

16 Q. Okay. Do you, and I am assuming if she would
17 have called in, if she would have called in and
18 said, "Hey, I want another appointment" or
19 "Hey, I am suffering" or "They didn't --" I
05:19 20 mean, I would assume you would have another
21 note between these seven months?

22 A. Correct.

23 Q. Okay. I guess does it at all surprise you that
24 you gave the recommendations and then she never
25 comes back and asks you to follow up or to give

ADA HEALTH CARE PROVIDER/PHYSICIAN CERTIFICATION

Date: 3/22/12

Employee/Patient Name: Alison Matthews

Position Title: Pediatric Endocrinology Fellow

Re: Request for Reasonable Accommodation

Dear Health Care Provider/Physician:

University Hospitals has received a request for reasonable accommodation from our employee and your patient named above. As set forth in the Authorization to Release Medical Information, the employee has authorized you to release to us the necessary medical information that will allow us to evaluate this request.

In order to assist us with our obligations under the American with Disabilities Act (ADA) and the American with Disabilities Amendments Act (ADAAA), we are requesting that you to provide feedback to the following questions based on your medical expertise.

Initial Information

An employee has a disability if he or she has an impairment that substantially limits one or more major life activities or has a record of such an impairment. **"Substantially limits" under the ADAAA has been broadened to allow** someone with an impairment to be "regarded as" having a disability, even without the perception that the impairment limits a major life activity, provided that the impairment does not have an actual *or expected* duration less than or equal to six months.

The ADAAA provides examples of "major life activities," including "caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, working, and the operation of a major bodily function, such as functions of the immune system, normal cell growth and digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine and reproductive functions."

In general, the following is a brief summary of the essential functions of the position held by the above named employee (including the physical and mental demands of the job.)

- Obtain focused history; perform directed physical examination; formulate and prioritize differential diagnoses based on patient information, current scientific evidence and sound clinical judgment on all patients seen in the out-patient clinics and in-patient consultation service.
- Precept all patients with a member of the attending faculty in a timely manner, discussing clinical findings and incorporating results of all available ancillary investigations.



ADAN000011

- Counsel patients and their families regarding diagnostic and management plans. Communicate clinical impression and results of investigations to patients and their families effectively and at the appropriate developmental/educational level. Be a strong advocate for quality patient care and identify appropriate resources to address patient needs. Take ownership and responsibility for ongoing patient care.
- Maintain accurate, timely, complete and legible medical records.
- Acquire sound foundation of knowledge with adequate scope and depth in the various subspecialty diagnoses, including basic science and clinical endocrinology. Use self-reflection to identify areas of knowledge deficits, utilize available resources and demonstrate initiative in consistent self-directed learning. Demonstrate critical thinking skills in evaluating medical literature.
- Actively participate in all educational sessions of the division, with adequate preparation on assigned topic presentations. Take an active role in educating medical students, residents, nurses and other medical personnel.
- Seek opportunities to strengthen knowledge and skills. Accept feedback appropriately and act on areas identified for improvement.
- Actively seek opportunities and collaborate with members of the faculty on Quality Assessment and Quality Improvement projects.
- Engage in clinical or basic science research project with substantive scholarly exploration, including hypothesis development, execution of the project and preparation of manuscript for presentation and publication.
- Demonstrate compassion and respect for others, sensitivity and responsiveness to others' needs, productive work habits and ability to function effectively with other members of the health care team.
- Act with honesty and integrity, engage in ethical medical practices.
- Develop the knowledge, clinical abilities, interpersonal and communication skills to function effectively in the role of a sub-specialty consultant.
- Works a minimum of 40 hours per week

Please answer the following the questions to help us determine whether the above named employee has a qualifying disability and whether the employee needs a reasonable accommodation in order to perform the essential functions of his/her position.

1. Does the employee have disability that substantially limits one or more major life activities? Yes ☒ No ☐

If yes, describe the disability and any limitation(s) in detail?

SOCIAL PHOBIA
DIFFICULTIES IN UNKNOWN SOCIAL SITUATIONS

2. Does the employee use any mitigating measures (e.g., medications, assistive technologies, etc.) Yes ☒ No ☐

If yes, how does the mitigating measure affect the disability?

IT'S helping to decrease the symptoms

3. Does the disability affect the employee's ability to perform any one of the essential functions of the position? Yes ☒ No ☐

If yes, please describe the impact on the person's ability to perform any specific essential function(s). PUBLIC SPEAKING AS CASE CONFERENCE, SPECIALLY UN-REHEARSED

4. Are there any restriction(s) and/or accommodation(s) that would allow the employee to perform the essential functions of the position? Yes ☒ No ☐

If yes, please list the restriction(s) and/or accommodation(s). I would

recommend not to evaluate employee performance on case conference particularly un-rehearsed.

5. Is the need for accommodation likely to be temporary or permanent?

Temporary ☐ Permanent ☒ probably decrease the rest of the fellowship.

If temporary, how long do you estimate that the need for the restriction(s) and/or accommodation(s) will last?

The employee is actively seeking help for her symptoms and is very motivated in her treatment. She has made some progress already.


Signature of Health Care Provider/Physician

Date:

5/3/12

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